

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

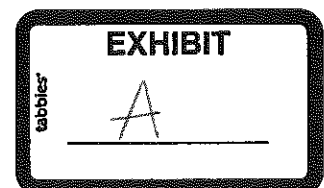
DAVID BREWER,)	Cause No. CV-14-65-GF-BMM-JTJ
)	
Plaintiff,)	
)	
vs.)	
)	
BNSF RAILWAY COMPANY, a)	DECLARATION OF BENJAMIN O.
Delaware corporation,)	RECHTFERTIG
)	
Defendant.)	

I, Benjamin O. Rechtfertig, declare as follows:

1. I am of legal age and otherwise competent to make this Declaration.

The facts contained in this Declaration are based on my personal knowledge and are true and correct.

2. I am one of the attorneys for BNSF in the above-captioned matter, and was one of the attorneys for BNSF in the underlying administrative matter, *Brewer v. BNSF*, Case No. 2014-FRS-00001.

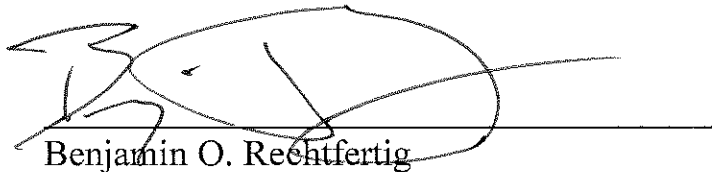


3. While at the administrative level, BNSF produced to Defendant over 700 pages of information in response to Plaintiff's various discovery requests.

4. Since Plaintiff filed the instant matter in this Court, BNSF has produced approximately 800 pages of additional information in response to further discovery requests.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 16th day of October, 2015.



Benjamin O. Reichtfertig